

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application.

Claims 9-25, 31-46, and 49-50 are pending.

Claims 20, 31, 33, 44 and 50 are amended.

Claims 1-8, 26-30 and 47-48 are cancelled.

Claim Rejections, 35 U.S.C. §112, First Paragraph

Claims 9-13 and 31-32 were rejected under 35 U.S.C. § 112, first paragraph. The Applicant respectfully disagrees.

Claim 9 is rejected by the Office for the feature “receiving an input string containing first and second languages that are represented with out [sic] using different text forms”. *See Office Action Dated February 20, 2005, Page 7 (emphasis in original)*. The Applicant respectfully disagrees. Beginning at page 31 of the subject Application, an example of such a text string is discussed, the portion of which is excerpted as follows for the sake of convenience:

To illustrate a multi-language conversion, suppose a user inputs a text string “woaiduinternetzazhi”, which means “I love to read INTERNET magazines”. Upon receiving the initial string “woaidu”, the Chinese typing model yields a higher probability than the English typing model and converts that portion of the input text to “我爱读”. The architecture continues to find the subsequently typed portion “interne” ambiguous until letter “t” is typed. At this point, the English typing model returns a higher probability for “INTERNET” than the Chinese typing model and the language input architecture converts this portion of the input text to “INTERNET”. Next, the Chinese typing model exhibits a higher probability for “zazhi” than the English typing model

and the language input architecture converts that portion of the input text to “杂志”. *Application, Page 31, Lines 7-17.*

As shown in the above excerpted portion, the subject Application describes a text string “woaiduinternetzazhi” containing different languages (e.g., Chinese and English) that are represented without using different text forms. Therefore, this feature is supported by the Application, as filed, and withdrawal of the rejection with respect to Claim 9 and Claims 10-13 which depend from Claim 9, is respectfully requested.

Claim 31 has been amended [portions of the amendment appear in bold/italics below] to recite a language input architecture including:

- a typing model to receive an input string and determine a typing error probability of how likely *at least one* candidate string was incorrectly entered as the input string, the typing model being trained in a language; and
- a language model to provide output strings for each *said* typing *candidate*, the language model being trained in *another* language.

The amendment has been made to clear the confusion expressed by the Office of “first” and “second” languages and to correct antecedent basis. It should be noted that the Office referenced Claim 31 twice, and it is believed that the Office was instead referencing Claim 32. Accordingly, withdrawal of the rejection with respect to Claim 31, as well as Claim 32 which depends from Claim 31, is respectfully requested.

Claim Rejections, 35 U.S.C. §112, Second Paragraph

Claims 33, 44 and 50 were rejected under 35 U.S.C. § 112, second paragraph. The Applicant has amended these claims to remove the term “highest” or “higher” and therefore withdrawal of the rejection is respectfully requested.

Claim Rejections 35 U.S.C. §102(e)

Claims 1-8, 26-29 and 48 were rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent No. 6,073,146 to Chen (hereinafter “Chen”). These Claims have been cancelled, thereby obviating the rejection.

Claim Rejections 35 U.S.C. §103(a)

Claims 9-13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chen. The Applicant respectfully disagrees.

Claim 9 recites “receiving an input string containing at least first and second languages that are represented without using different text forms” and “determining at least one candidate string in the first language that may be used to replace the input string based on a probability of how likely the first candidate string was incorrectly entered as the input string in the first language”. Chen does not disclose, teach or suggest these aspects.

It is respectfully submitted that the Office has misinterpreted the “different text forms” feature as recited in Claim 9. Claim 9 does not recite “modes”. The Office, however, indicates that this feature was “interpreted as without switching modes”. *Office Action Dated February 10, 2005, Page 12*. As the Office correctly asserts, Chen at “column 5, lines 13-15, [describes] ‘mix text, both Chinese and non Chinese words can be processed by delimiting the non Chinese words with a

special character, e.g., a space". *Office Action Dated February 10, 2005, Page 12.* Thus, Chen describes mixed text entry, such that Chinese syllables that are marked with diacritics versus non-Chinese text, which is marked with delimiters and does not include diacritics. *See Chen, Col. 6, Line 66 to Col. 7, Line 9 and Col. 9, Lines 35-40.* Therefore, Chen does not disclose, teach or suggest the above referenced features. For at least these reasons, claim 9 is allowable over Chen. Applicant respectfully requests that the §103 rejection of claim 9 be withdrawn.

Claims 10-13 depend directly from claim 9. Accordingly, for at least these reasons, these claims are allowable and withdrawal of the rejection is respectfully requested.

Claim Rejections 35 U.S.C. §103(a)

Claims 14-25 and 49-50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chen in view of well-known-prior art (MPEP 2144.03) (hereinafter "Examiner's Assertion") and further in view of U.S. Patent Number 6,487,533 to Hyde-Thomson et al. (hereinafter "'Hyde-Thomson"). The Applicant respectfully disagrees.

Claim 14 is directed to a method including "receiving an input string containing at least first and second languages", "determining at least one first candidate string that may be used to replace the input string based on a first probability of how likely the first candidate string was incorrectly entered as the input string in the first language", "determining at least one second candidate string that may be used to replace the input string based on a second probability of how likely the second candidate string was incorrectly entered as the input string in the second language", "using the first candidate string if the first probability is

higher than the second probability to derive at least one output string containing the first language” and “using the second candidate string if the first probability is lower than the second probability to derive at least one output string containing the second language”. Neither Chen, the Examiner’s Assertion, nor Hyde-Thomson, alone or in combination, disclose, teach or suggest the claimed aspects.

The Office asserts that Chen “discloses determining at least one second candidate string that may be used to replace the input string”. *See Office Action Dated February 10, 2005, Page 15.* The Applicant respectfully disagrees. Chen merely describes “a computer processing system for phonetic Chinese that allows a mixed Chinese and non Chinese (e.g., English) text to be processed”. *See Chen, Col. 4, Lines 23-25.* Claim 14, however, recites first and second candidate strings that may be utilized to replace the input string. Therefore, either of the first and second candidate strings may be used in the “using” steps to replace the input string. Chen, however, merely describes a mixed Chinese and non Chinese text and does not disclose, teach or suggest the two determining steps as claimed.

The Office then correctly asserts that Chen “does not expressly disclose the step of determining second candidate based on a second probability of how likely the second candidate string was incorrectly entered as the input string in the second language”. *See Office Action Dated February 10, 2005, Page 15.* The Office also asserts, however, that “official notice is taken that the feature of determining a candidate string based on a probability of correctness in the input string in English language (second language) is well known in the art”. *See Office Action Dated February 10, 2005, Page 15.* The Applicant respectfully disagrees.

To make a *prima facie* case of obviousness, “the references must be considered as a whole and must suggest the desirability and thus the obviousness

of making the combination.” *See MPEP § 2141 and Hodosh v. Block Drug Co., Inc.*, 786 F.2d 1136, 1143 n.5, 220 USPQ 182, 187 n.5 (Fed. Cir. 1986). Additionally, “it is necessary to ascertain whether the prior art teachings would appear to be sufficient to one of ordinary skill in the art to suggest making the claimed substitution or other modification.” *In re Lahu*, 747 F.2d 703, 223 USPQ 1257, 1258 (Fed. Cir. 1984).

As stated above, claim 14 recites two determining steps which are performed based on respective first and second probabilities of how likely the first and second candidate strings were incorrectly entered as the input string in the respective first and second languages. The Examiner’s Assertion, however, merely contains the unsupported assertion that “it would have been obvious to one of ordinary skill in the art at time the invention was made to modify Chen by specifically providing a mechanism of determining a candidate string based on a probability of correctness in the input string in English language, for the purpose of improving reliability for the system”. *See Office Action Dated February 10, 2005.*

The Applicant respectfully submits that no such motivation is provided by Chen and that such a combination with the Examiner’s Assertion would not result in the claimed invention. Chen relies exclusively on special markings to indicate whether the text is Chinese or non Chinese, and does not compute probabilities for an input string as claimed in Claim 14 to determine whether it is likely that the input string is in a first language or a second language. Accordingly, Chen, even if modified as asserted, would not result in the claimed limitation and further contains no motivation for the modification.

The Office then asserts Hyde-Thomson to correct the defects of Chen and the Examiner's Assertion. Specifically, the Office asserts that "it would have been obvious to one of ordinary skill in the art at time the invention was made to modify Chen in view of well know prior art by specifically providing a mechanism of determining language based on a likelihood value, as taught by Hyde-Thomson, for the purpose of identifying a language for further processing". *See Office Action Dated February 10, 2005, Page 16.* The Applicant respectfully disagrees.

Hyde-Thomson is directed to a unified messaging system with automatic language identification for text-to-speech conversion. Although Hyde-Thomson mentions conversion of text-to-speech utilizing different languages, text is converted utilizing a single language, as shown in the following excerpts that were asserted by the Office:

The trigraph analyzer examines a text sequence, and performs language identification operations by first determining the occurrence frequencies of sequential 3-character combinations within the text, and then comparing the determined occurrence frequencies with reference occurrence statistics for various languages. The set of reference occurrence statistics associated with a given language are stored together as a corecurrence library. The trigraph analyzer determines a closest match between the determined occurrence frequencies and a particular corecurrence library, and returns a corresponding language identifier and likelihood value to the message inquiry unit. *See Hyde-Thomson, Col. 3, Lines 6-17.*

Upon receiving the language identifier and an acceptable likelihood value, the message inquiry unit 226 selects the appropriate text-to-speech engine 242, 243, 244, 245, 246 in step 314. In the event that the text-to-speech engine 244, 245 and its associated phoneme library 254, 255 do not presently reside within the memory 210, the message inquiry unit 226 transfers the required text-to-speech engine 244, 245 and the

corresponding phoneme library 254, 255 from the data storage unit 206 into the memory 210. *See Hyde-Thomson, Col. 7, Lines 13-21.*

As shown in the above excerpted portion, Hyde-Thomson merely identifies a particular text-to-speech engine which is then used to convert text to speech. Neither Hyde-Thomson, Chen, nor the Examiner's Assertion, alone or in combination, disclose, teach or suggest the two "using" steps as claimed.

The USPTO provides an example of an improper hindsight rejection in the publication *Formulating and Communicating Rejections under 35 U.S.C. 103 for Applications Directed to Computer-Implemented Business Method Inventions* beginning at page 37, a portion of which is excerpted as follows:

Example 17: Improper rejection based upon hindsight - general motivation statement.

a. The claimed invention

The invention is drawn to a smart card containing a tracking mechanism, which tracks shopping preferences of consumers by recording the type, quantity, and dates of purchase for a pre-selected group of products. The smart card is useful in a system and method for introducing new and alternative products that are of the same type as products normally purchased by the shopper. The smart card records the shopper's purchases and submits an automatic notification to the shopper when a quantity threshold is achieved for the pre-selected products. This notification will encourage the consumer to consider alternative products by providing the consumer incentives, such as a pricing discount, to purchase an alternative product.

Claim 1:

A method for using a smart card in a marketing analysis program designed to introduce new products, the method comprising the steps of:

storing product information on the smart card when said products are purchased by a consumer wherein said information including type, quantity and dates of the product purchased;
identifying for each product a threshold for each of said type, quantity and dates of products purchased;

determining an incentive for an alternative product based on said threshold; and
automatically notifying said consumer when said threshold is reached for a given product identified on the smart card and providing the consumer with said incentive, whereby the incentive encourages the consumer to consider alternative products.

b. Evidence

Reference A discloses smart card that tracks consumer preferences by recording the type, quantity, and dates of purchase of pre-selected products to determine trends in consumer purchases. The smart card is periodically read by a scanner to determine its contents for market analysis. In return for using the smart card and participating in the marketing program, the user is provided with free product coupons for products that are normally purchased by the shopper.

Reference B discloses a traditional consumer incentive program that provides coupons for the purchase of named products based upon the consumer's purchase of those same products to promote customer loyalty.

c. Poor statement of the rejection

Claim 1 is rejected under 35 U.S.C. 103 as being unpatentable over Reference A in view of Reference B. Reference A discloses the conventional use of a smart card to track consumer preferences and provide incentives. However, Reference A does not disclose the automatic notification to consumer providing incentives. Reference B discloses providing incentives to consumers to purchase the desired products. It would have been obvious to combine Reference A's smart card with Reference B's incentive to consumers because the combination would allow Reference A's smart card to be more efficient.

d. Analysis

The motivation, improve efficiency, is too general because it could cover almost any alteration contemplated of Reference A and does not address why this specific proposed modification would have been obvious. Additionally, there is nothing in either of references that would suggest automatically notifying the consumer when reaching a threshold nor is there anything in either reference that would suggest the notifying step. Finally, although Reference B

teaches a traditional coupon scheme to promote customer loyalty, there is no suggestion, other than applicant's disclosure, to employ this scheme to promote the introduction of new and alternative products. **The rejection is improper.** *Formulating and Communicating Rejections under 35 U.S.C. 103 for Applications Directed to Computer-Implemented Business Method Inventions, Pages 36-37.*

It is respectfully submitted that the Office has engaged in an improper rejection similar to the rejection above. There is no support in the references, alone or in combination, for the modification.

In accordance with Applicant's duty under M.P.E.P. §2144.03 to seasonably challenge such unsupported statements, the Examiner is hereby again requested to cite a reference supporting the position that it would have been obvious to determine "at least one first candidate string that may be used to replace the input string based on a first probability of how likely the first candidate string was incorrectly entered as the input string in the first language" and determine "at least one second candidate string that may be used to replace the input string based on a second probability of how likely the second candidate string was incorrectly entered as the input string in the second language" as claimed. If the Examiner is unable to provide such a reference, and is relying on facts based on personal knowledge, Applicant hereby requests that such facts be set forth in an affidavit from the Examiner under 37 C.F.R. 1.104(d)(2). Absent substantiation by the Examiner, it is respectfully requested that the rejection under 35 U.S.C. § 103 be withdrawn. Accordingly, for at least these reasons, claim 14 is allowable and withdrawal of the rejection is respectfully requested.

Claims 15-22 depend directly from claim 14. Accordingly, for at least these reasons, these claims are allowable and withdrawal of the rejection is respectfully requested.

Claim 23 recites “allowing entry of an input string containing at least first and second languages without switching modes for entry of the first and second languages”, “determining probable candidate strings in at least one of the first and second languages that may be used to replace the input string based on probabilities of how likely each of the candidate strings was incorrectly entered as the input string”, and “selectively performing, based on the probabilities, one of (1) converting the input string to an output string in the first language and outputting the output string, or (2) outputting the input string in the second language”. Neither Chen, the Examiner’s Assertion, nor Hyde-Thomson, alone or in combination, disclose, teach or suggest the claimed aspects.

As previously described in relation to claim 1, Chen describes mixed text entry which requires the use of different text forms, such that Chinese syllables are marked with diacritics versus non-Chinese text, which is marked with delimiters and does not include diacritics. *See Chen, Col. 6, Line 66 to Col. 7, Line 9 and Col. 9, Lines 35-40.* Therefore, Chen does not disclose, teach or suggest the above referenced limitations. Neither the Examiner’s Assertion nor Hyde-Thomson corrects this defect.

Additionally, as previously described in relation to claim 14, neither Hyde-Thomson, Chen, nor the Examiner’s Assertion, alone or in combination, disclose, teach or suggest the two determining steps as claimed in claim 23. Further, neither Chen, the Examiner’s Assertion, nor Hyde-Thomson, alone or in combination, disclose teach or suggest the “selectively performing” step as claimed in claim 23. As the Examiner is aware, the Examiner “ordinarily should reject each claim on all valid grounds available.” *M.P.E.P. §707.07(g)* Further, “[w]here a major technical rejection is proper, it should be stated with a full development of reasons

rather than by a mere conclusion coupled with some stereotyped expression.” *Id.* Therefore, the Applicant again respectfully requests that the Office provide a reference in support of a rejection. Absent support by the Office for the “selectively performing” step, the Applicant respectfully requests withdrawal of the rejection.

Claims 24-25 depend directly from claim 23. Accordingly, for at least these reasons, these claims are allowable. These claims are also allowable based on their own recited features, which are not disclosed, taught or suggested by Chen, the Examiner’s Assertion, nor Hyde-Thomson. For example, claim 24 recites “selectively displaying the output string or the input string in the single edit line”, which is not disclosed, taught or suggested by the asserted references. Therefore, withdrawal of the rejection is respectfully requested.

Claim 49 recites “determine probable candidate strings in at least one of the first and second languages that may be used to replace the input string based on probabilities of how likely each of the candidate strings was incorrectly entered as the input string”. **Claim 50** recites “determine at least one first candidate string written in the phonetic text that may be used to replace the input string based on a first probability of how likely the first candidate string was incorrectly entered as the input string” and “determine at least one second candidate string written in the non-phonetic text that may be used to replace the input string based on a second probability of how likely the second candidate string was incorrectly entered as the input string in the second language”. Accordingly, as previously recited in respect to claim 14, these claims are allowable as neither Chen, the Examiner’s Assertion, nor Hyde-Thomson, alone or in combination, disclose, teach or suggest these aspects and withdrawal of the rejection is respectfully requested.

Claim Rejections 35 U.S.C. §103(a)

Claims 30-46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chen in view of U.S. Patent Number 6,246,976 to Mukaigawa et al. (hereinafter "Mukaigawa"). The Applicant respectfully disagrees.

Claim 31 has been amended as previously described, and as amended, recites a language input architecture including "a typing model to receive an input string and determine a typing error probability of how likely at least one candidate string was incorrectly entered as the input string, the typing model being trained in a language" and "a language model to provide output strings for each said typing candidate, the language model being trained in another language". Neither Chen nor Mukaigawa, alone or in combination, disclose, teach or suggest these aspects.

Beginning at page 7 of the subject specification, an exemplary use of the typing model and typing error probability with a language model is described. A typing model, for instance, may be configured to generate a list of probable typing candidates that may be substituted for the input string based on typing error probabilities of how likely each of the candidate strings was incorrectly entered as the input string. The probable typing candidates may be stored in a database. The language model may then provide probable conversion strings for each of the typing candidates. The conversion string may be written in a different language or different text form than the input string. For example, the input string might comprise Chinese Pinyin or other phonetic text and the output string might comprise Chinese Hanzi or other language text. Based upon the probabilities derived in the typing and language models, for instance, a search engine may select the associated typing candidate and conversion candidate that exhibits the

highest probability. For example, the search engine converts the input string (e.g., written in phonetic text) to an output string consisting of the conversion candidate returned from the language model so that the entered text form (e.g., phonetic text) is replaced with another text form (e.g., language text). In this manner, any entry error made by the user during entry of the phonetic text is eliminated.

The Office correctly asserts that Chen does not expressly disclose "typing error probability". The Office, however, then again makes an unsupported assertion, that time stating that this feature is "well known in the art as evidenced by Chen himself". *Office Action Dated February 10, 2005, Page 19*. The Applicant respectfully submits that this assertion is incorrect as well as inconsistent with the teachings of Chen.

The Office also correctly asserts that "Chen does not expressly disclose the model 'being trained in a first language'". *See Office Action Dated February 10, 2005, Page 19*. The Office then asserts Mukaigawa to correct these defects. Mukaigawa recites "identifying a language represented by a character code and its character code system An occurrence probability table describing for each character the probability that a character code occurs is prepared for each combination of a language and a character code system". *See Mukaigawa, Abstract*. The Office then asserts that "it would have been obvious to one of ordinary skill in the art at time the invention was made to modify Chen by specifically providing a statistical processing for training in a language, as taught by Mukaigawa, for the purpose of obtaining language identification of a character code and occurrence probability data". *See Office Action Dated February 10, 2005, Page 20*. The Applicant respectfully disagrees. As shown in the assertion made by the Office, Mukaigawa is relied on exclusively for disclosing

probabilities. However, the Office fails to indicate how the references of Chen and Mukaigawa teach the claimed relationship of the language model with the typing model.

As previously described, obviousness cannot be established by combining the teaching of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination. Under section 103, teachings of references can be combined only if there is some suggestion or incentive to do so. *ACS Hosp. Sys., Inc. v. Montefiore Hosp.*, 732 F.2d 1572, 221 USPQ 929 (Fed. Cir. 1984). Thus, the Office may not use the patent application as a basis for the motivation to combine or modify the prior art to arrive at the claimed invention. In the rejection of Claim 31, it is respectfully submitted that the Office has not supplied motivation from the references for support of the modifications, but rather has relied on unsupported assertions (i.e., the Examiner's Assertion) to make the rejection.

Accordingly, it is respectfully submitted that a *prima facie* case of obviousness has not been established and withdrawal of the rejection is respectfully requested.

Claim 32 depends directly from claim 31. Accordingly, for at least these reasons, these claims are allowable as being dependent on an allowable base claim. These claims are also allowable based on their own recited features, which are not disclosed, taught or suggested by Chen, nor Woodruff, alone or in combination. For example, claim 30 also recites typing error probabilities, which as previously described in relation to claim 31 is not disclosed, taught, or suggested by Chen or Mukaigawa, alone or in combination. Therefore, withdrawal of the rejection is respectfully requested.

Claim 33 is directed to a language input architecture comprising “a first typing model to receive an input string and determine a first typing error probability of how likely a first candidate string was incorrectly entered as the input string”, “a second typing model to receive the input string and determine a second typing error probability of how likely a second candidate string was incorrectly entered as the input string” and “a search engine to select one of the first and second candidate strings with a highest typing error probability”.

The Office first asserts Chen, stating “Chen does not expressly disclose typing error probability”. *See Office Action Dated February 10, 2005, Page 21*. It is respectfully submitted that the Office then contradicts itself, asserting that “the feature of using probability for determining candidates is well known in the art as evidenced by Chen himself who further discloses using statistical model for the notional words (column 5, line 8) , which is inherently includes probability calculation for determining likely candidate”. *Id.* The Office then states it would have been obvious to make the modification for the purpose of further removing ambiguity, and references the following portions of Chen, which are excerpted as follows:

Any remaining ambiguity of notional words is removed by a statistical model. *See Chen, Col. 5, Lines 7-8.*

If an erroneous spelling is detected 408, i.e., there is not match in table 700, the most probable syllable is displayed 409. This is done by presenting a menu of probable choices, i.e. best matches 1023, selected from the Chinese syllable list 700. The user selects 409 the proper syllable from the menu by using a selection apparatus, e.g., a mouse 1031 or a key. *See Chen, Col. 12, Line 63 to Col. 13, Line 2.*

As shown in the above excerpted portions, Chen merely describes selection by a user from a menu. As claimed, in claim 33, however, a search engine selects “one

of the first and second candidate strings with a highest typing error probability". Neither Chen nor the other asserted references, alone or in combination, disclose, teach or suggest this aspect.

The Office then asserts that "Chen does not expressly disclose a separate typing error probability for each of languages". *See Office Action Dated February 10, 2005, Page 21*. The Office, however, asserts Mukaigawa to correct this defect. As previously discussed above, however, the Office has not shown a motivation in the references that support the combination, but rather has engaged in impermissible hindsight reconstruction.

Further, the Office asserts that "Chen in Mukaigawa further discloses a search engine to select one of the first and second candidates with a highest [typing error] probability" and asserts a portion of Mukaigawa which is excerpted for convenience as follows:

The index database 54 for search is accessed using a search engine 53, so that a user can perform desired search processing using his or her own computer 52. *See Mukaigawa, Col. 11, Lines 10-13.*

Although the above excerpt mentions a search engine, the search engine is merely utilized to search an index. Neither Mukaigawa nor Chen, alone or in combination, teach or suggest a search engine to select "one of the first and second candidate strings" from respective first and second typing models, respectively. For at least these reasons, claim 33 is allowable and withdrawal of the rejection is respectfully requested.

Claim 42 recites language input architecture comprising "a user interface to receive an input string written in a combination of phonetic text and non-phonetic text", "a first typing model to produce probable first typing candidates written in

the phonetic text that may be substituted for the input string based on typing error probabilities of how likely each of the first candidate strings was incorrectly entered as the input string”, “a second typing model to produce probable second typing candidates written in the non-phonetic text that may be substituted for the input string based on typing error probabilities of how likely each of the second candidate strings was incorrectly entered as the input string”, “a language model to provide possible conversion strings written in language text for the first typing candidates written in the phonetic text”, and “a search engine configured to selectively (1) convert the input string to one of the conversion strings so that the phonetic text is replaced with the language text, or (2) output one of the second candidates so that the non-phonetic text is maintained without conversion”. Accordingly, this claim is also allowable for the same reasons as recited in relation to claim 33 and withdrawal of the rejection is respectfully requested.


Claims 34-41 depend either directly or indirectly from claim 33. **Claims 43-46** depend either directly or indirectly from claim 42. Accordingly, for at least these reasons, these claims are allowable as being dependent on an allowable base claim. These claims are also allowable based on their own recited features, which are not disclosed, taught or suggested by Chen, the Examiner's Assertion, nor Mukaigawa, alone or in combination. Therefore, withdrawal of the rejections is respectfully requested.

Conclusion

Claims 1-46, and 48-50 are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the subject application.

Respectfully Submitted,

Date: 4/28/05

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